

EXHIBIT “A”

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,

v.

Case No.

PAOLO PROVENZI, IKONICK
COLLECTION LTD., and MOHAMMED
ALSALOUSSI,

1:21-cv-00398

Defendants.

VIDEOCONFERENCE DEPOSITION OF
MOHAMMED ALSALOUSSI

DATE: Thursday, August 24, 2023

TIME: 10:43 a.m.

LOCATION: Remote Proceeding

Neville Peterson LLP

55 Broadway, Suite 2602

New York, NY 10006

REPORTED BY: Logan Thoreau, Notary Public

A P P E A R A N C E S

ON BEHALF OF DEFENDANT PAOLO PROVENZI:

ADAM MICHAEL LEVY, ESQUIRE (by videoconference)
Of Counsel, Cinotti LLP
11 Broadway, Suite 368
New York, NY 10004
adam@levygoldenberg.com
(646) 392-8258

ANDREA LOCATELLI, ESQUIRE (by videoconference)
Locatelli & Partners Family Office
Via Nicolo V, 10
00165 Roma RM, Italy
legal@locatelli.pro
+39 035-0442846

ON BEHALF OF DEFENDANTS MOHAMMED ALSALOUSSI AND
IKONICK COLLECTION LTD.:

RICHARD F. O'NEILL, ESQUIRE (by
videoconference)
Neville Peterson LLP
701 Fifth Avenue
Seattle, WA 98104
roneill@npwny.com
(206) 905-3648

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

A P P E A R A N C E S (Cont'd)
ON BEHALF OF DEFENDANTS MOHAMMED ALSALOUSSI AND
IKONICK COLLECTION LTD.:

JOHN M. PETERSON, ESQUIRE (by videoconference)
Neville Peterson LLP
55 Broadway, Suite 2602
New York, NY 10006
jpeterson@npwny.com
(212) 635-2730

ALSO PRESENT:
Paolo Provenzi, Defendant (by videoconference)
Roberto Provenzi, Defendant Associate (by
videoconference)

I N D E X

EXAMINATION:	PAGE
By Mr. Levy	9
By Mr. Peterson	219
By Mr. Levy	222

E X H I B I T S

NO.	DESCRIPTION	PAGE
Plaintiff:		
Exhibit A	IKDEFS 1-7	94
Exhibit B	GOV 549-556	123
Exhibit C	GOV 7-13	123
Exhibit D	GOV 298-375	137
Exhibit E	Agreement	142
Exhibit F	GOV 224-279	150
Exhibit G	Retail Sales Contract	194

D O C U M E N T S R E Q U E S T E D

NO.	DESCRIPTION	PAGE
1	WhatsApp Messages Relating to Purchase of Ferrari F50	120
2	Communications Between/Behalf of Mohammed Alsaloussi/Ikonick and Ferrari SpA	160
3	Complete Sales Contract	196

1 D O C U M E N T S R E Q U E S T E D (Cont'd)

2 NO. DESCRIPTION PAGE

3 4 Label Appended to Contract 197

4 5 Communications Between

5 Mohammed Alsaloussi and C.A.R.

6 Leasing about Ferrari F50 201

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 M. ALSALOUSSI

2 Q What car was that?

3 A Lamborghini Aventador SV.

4 Q Does he have any interest in
5 Ikonick Collection LTD.?

6 A No, he has a -- this is where I
7 came up with the name. He has the Ikonick
8 Collection in Florida, so I thought it
9 would have been funny to tell him, well,
10 I'm going to own Ikonick Collection LTD.
11 In Canada.

12 Q How did he feel about that?

13 A He laughed at it.

14 Q He wasn't offended?

15 A No, we have no -- we don't have
16 this type of relationship. Barry's a very
17 easygoing -- he's the chairman of Mount
18 Sinai Hospital. He's the chairman of the
19 Miami Beach Police Foundation. He doesn't
20 really care, and he's a very good friend
21 of mine.

22 Q What's the address of the
23 headquarters of Ikonick Collection LTD.?

24 A My -- my Ikonick Collection
25 LTD.?

1 M. ALSALOUSSI

2 Q Right.

3 A In Alberta.

4 Q Can you give me the exact
5 address, please?

6 A You have it on the papers. I
7 cannot give you the exact address. I
8 don't have it with me right now, so. But
9 if you tell me that address --

10 Q Is it 14619 Ravine Point
11 Northwest, Edmonton?

12 A Yes.

13 Q And besides holding and owning
14 these exotics cars, does Ikonick
15 Collection LTD. do anything else?

16 A Nothing else. It's a holding
17 company for my vehicles.

18 Q How many vehicles does it
19 currently own?

20 A Well, right now, just one
21 because after this situation, I didn't
22 want to do anything else with Ikonick
23 Collection until this situation is
24 resolved.

25 Q Are you the sole shareholder of

1 M. ALSALOUSSI

2 Ikonick Collection LTD.?

3 A 100 percent.

4 Q And you're the sole officer,
5 director?

6 A Sole everything.

7 Q Any employees?

8 A No employees because it's not an
9 operating business. It's a holding
10 business where I wanted my collection to
11 be held under. It's a mechanism to hold
12 my vehicles under, which would have made
13 it easier for me to get my vehicles
14 insured under an umbrella insurance
15 policy.

16 Q So Mr. Skolnick, he's the
17 principal of Ikonick Motors LLC; right?

18 A Yes, in Florida.

19 Q That's in Florida. And is it
20 Ikonick Motors LLC that owns the Ikonick
21 Collection of cars in Florida?

22 A Yeah, it's his -- his business
23 that owns -- he's a dealership. He has a
24 dealership license. He has -- he has a
25 private collection, and he also